

LAW OFFICES OF BING LI, LLC
BING LI (BL 5550)
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ATTORNEYS FOR DEFENDANT-DEBTOR
JIMMY ZHAN A/K/A YI Q. ZHAN

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
KOON CHUN HING KEE SOY & SAUCE : 04 Civ. 2293 (JFB)(SMG)
FACTORY, LTD., a company :
organized under the laws of :
Hong Kong, : **NOTICE OF MOTION**
Plaintiff, :
: -against- :
STAR MARK MANAGEMENT, INC., a :
New York corporation; GREAT MARK :
CORPORATION, a New York :
corporation; JIMMY ZHAN, an :
individual (a/k/a Yi Q. Zhan); :
and JOHN DOES 1 through 10, :
Defendants. :
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PLEASE TAKE NOTICE that, upon the Declaration of Bing Li made the 16th day of July, 2010, together with the exhibits annexed thereto, the Memorandum of Law in support, and upon all of the pleadings and proceedings heretofore had herein, defendant/judgment debtor Jimmy Zhan a/k/a Yi Q. Zhan ("Zhan"), and his family members and certain nonparty corporations to this proceeding--Jessica Yang and/or Yang

Xiao Geng, his wife; Michael Zhan and Edmund Zhan, his two sons; Yan Zhang Yang, and Yu Mei Zhao, his parents-in-law; and G.K. Exotic Inc. (collectively "Nonparty Movants")--by and through their undersigned attorneys, will move this Court before the Honorable Steven M. Gold, U.S.M.J., at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, on August 13, 2010, at 9:30 p.m., or as soon thereafter as counsel may be heard, pursuant to Rule 69 of the Federal Rules of Civil Procedure ("F.R.Civ.P."), Section 5223 of the McKinney's Civil Practice Law and Rules ("CPLR"), CPLR 5240, and the Court's broad discretionary powers under CPLR 5240, for an order quashing or modifying twelve (12) subpoenas duces tecum all issued in the name of the Court on June 22, 2010 to the extent that disclosure concerning the assets and finances of the Nonparty Movants be not made, and granting the Nonparty Movants such other and further relief as the Court may deem just and equitable.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1 of the United States District Courts for the Southern and Eastern Districts of New York (amd. thr. 5/11/2010), any opposing affidavits and answering memorandum of law shall be served within fourteen (14) days after service of the moving papers, and any reply affidavits and

memoranda of law shall be served within seven (7) days after service of the answering papers.

Dated: New York, New York
July 16, 2010

LAW OFFICES OF BING LI, LLC
ATTORNEYS FOR JIMMY ZHAN A/K/A
YI Q. ZHAN

By: /s/
BING LI (BL 5550)
1350 BROADWAY, SUITE 1001
NEW YORK, NY 10018-0947
(212) 967-7690

CERTIFICATE OF SERVICE

I, Bing Li, hereby certify that on this 16th day of July, 2010, I served a true copy of the within Notice of Motion, Declaration of Bing Li, and Memorandum of Law in Support of Motion on the parties/entities herein named at the following address:

YUEN ROCCANOVA SELTZER & SVERD P.C.
132 Nassau Street, Suite 1300
New York, NY 10038
Tel. (212) 608-1178
Fax (212) 608-2913
Attention: Joseph T. Roccanova, Esq.
Attorneys for Plaintiff/Judgment Creditor
Koon Chun Hing Kee Soy & Sauce Factory, Ltd.
via ECF

BANK OF AMERICA
Legal Order Processing Dept. NE
5701 Horatio Street
Utica, NY 13502
via Regular Mail

BLUE RIBBON ACCOUNTING & TAX CPA
83-21 Broadway
Elmhurst, NY 11373
via Regular Mail

CAPITAL ONE BANK
Attention: 12070-7000
15000 Capital One Drive
Richmond, VA 23238-1119
via Email (Subpoena@capitalone.com)

CHARLES SCHWAB
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101 Montgomery Street
San Francisco, CA 94014
via Regular Mail

CHASE BANK
51-15 Metropolitan Avenue
Ridgewood, NY 11385
via Regular Mail

CHINA TRUST BANK
22939 Hawthorne Blvd.
Torrance, CA 90505
Attention: Lee Parish, Esq.
via Regular Mail

CITIBANK
Legal Department
100 Citibank Drive
San Antonio TX 78250
via Regular Mail

DISCOVER FINANCIAL SERVICES
P.O. Box 6103
Carol Stream, IL 60197-6103
via Regular Mail

FIRSTTRADE SECURITIES INC.
133-25 37th Avenue
Flushing, NY 11354
via Regular Mail

HSBC
Legal Department
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NORTH FORK BANK
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via Regular Mail

/s/

Bing Li (BL 5550)